

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

ADJUSTACAM LLC

v.

AMAZON.COM, INC.; ET AL.

NO. 6:10-CV-329-LED

JURY

**DECLARATION OF JOHN EDMONDS REGARDING PLAINTIFF'S RESPONSE IN
OPPOSITION TO THE MOTION TO SEVER AND STAY**

John J. Edmonds declares as follows:

1. I am a counsel of record for Plaintiff AdjustaCam LLC ("AdjustaCam") in the above-referenced action. I am over the age of 18 and I am fully competent to make this Declaration. I have personal knowledge of the facts stated herein from my work on this case.

2. As reflected in AdjustaCam's complaint in the *AdjustaCam v. Atlanta Network Technologies, Inc., et al.* ("*AdjustaCam II*") case, AdjustaCam presently understands that Guillemot makes, uses, sells, offers for sale and/or imports certain infringing "Hercules" branded webcams; that KYE infringes relative to certain "Agama" and "Genius" branded webcams, and that PDT infringes relative to "Minoru" branded webcams.

3. Exhibit 3 to Plaintiff's Response in Opposition to the Motion to Sever and Stay ("Plaintiff's Response") is a chart that lists Plaintiff's present understanding, based upon publicly available information, of infringing webcams by defendant in this case. To the extent that AdjustaCam's complaints or infringement contentions list additional webcams, those lists would be controlling.

4. The *AdjustaCam II* suit was filed in December 2010, and efforts to serve foreign defendants via international means are underway.

5. As reflected in the *AdjustaCam II* complaint, AdjustaCam presently understands that the parent Guillemot entity is located in France, the parent KYE entity is located in Taiwan, and the parent PDT entity is located in the United Kingdom.

6. AdjustaCam dismissed Ezonic Corporation and Prolynkz, LLC from this case because they were understood to be defunct.

7. Exhibit 4 to Plaintiff's Response is a print out from Micro Center's website at www.microcenter.com.


8. Exhibit 5 to Plaintiff's Response is a print out from the U.S. Patent & Trademark Office's ("USPTO") website at www.uspto.gov.

9. Exhibit 6 to Plaintiff's Response is a print out from Allbusiness.com at <http://www.allbusiness.com/company-activities-management/product-management/12868863-1.html>.

10. Exhibit 7 to Plaintiff's Response is a print out from the U.S. Patent & Trademark Office's ("USPTO") website at www.uspto.gov.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Houston, Texas on this 31st day of January, 2011.



John J. Edmonds